

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|----------------------------------|---|----------------|
| DIGISOUND-WIE, INC., |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | No. 07 CV 6535 |
| |) | |
| BESTAR TECHNOLOGIES, INC. et al. |) | Judge Lindberg |
| |) | |
| Defendant. |) | |

**DEFENDANT CC ELECTRO SALES, INC.'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE
PLEAD TO AMENDED COMPLAINT**

Defendant, CC Electro Sales, Inc. ("CC Electro Sales"), by and through its attorneys, respectfully requests that the Court grant it an extension of time, to April 23, 2008, to answer or otherwise plead in response to Plaintiff's Amended Complaint. In support of its Motion, CC Electro Sales states as follows:

1. CC Electro Sales was served with the Amended Complaint on March 12, 2008.

Therefore, its appearance, answer or other pleading was due on April 1, 2008. Concurrent herewith, CC Electro Sales has filed its appearance in this case.

2. Plaintiff's Amended Complaint contains numerous causes of action directed against CC Electro Sales, including a federal claim under the Lanham Act, 15 U.S.C. § 1125(a), and pendent state-law claims for breach of contract, breach of fiduciary duty, tortious interference with contract, tortious interference with prospective economic advantage, misappropriation of trade secrets, and civil conspiracy.

3. Lead counsel for CC Electro Sales, Daniel E. Beederman, has been out of town for the majority of the last two weeks, and requires additional time in order to properly evaluate the

factual and legal claims in this lawsuit. Due to his travels, Mr. Beederman has not yet had the ability to discuss the case with CC Electro Sales in order to formulate a strategy and response to the allegations of the Amended Complaint.

4. Mr. Beederman has spoken to Arthur Sternberg, counsel for Plaintiff, regarding an extension of time to answer or otherwise plead. Mr. Sternberg indicated that he does not oppose the present motion for an extension of time to answer or otherwise plead.

5. This motion is being brought in good faith, and not for the purpose of hindrance or delay. No previous extensions have been sought by CC Electro Sales. Plaintiff will not be prejudiced by allowing CC Electro Sales additional time to answer or otherwise plead to the Amended Complaint.

WHEREFORE, defendant CC Electro Sales, Inc., respectfully requests that, for the reasons set forth above, the Court grant the present Motion, grant it to April 23, 2008, to answer or otherwise plead to Plaintiff's Amended Complaint, and grant it such further relief as the Court deems just and appropriate.

Respectfully submitted,

CC ELECTRO SALES, INC.

By: /s/ Daniel E. Beederman

One of Its Attorneys

Daniel E. Beederman, Attorney No. 03121545
Adam J. Glazer, Attorney No. 6199294
David S. Makarski, Attorney No. 6237604
Schoenberg Finkel Newman & Rosenberg, LLC
222 S. Riverside Plaza, Suite 2100
Chicago, Illinois 60606
(312) 648-2300